

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON

IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 WAVE 12
<i>Juanita Barton, et al v. Ethicon LLC and Johnson & Johnson</i> Case No. 2:13-cv-20332	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION TO
EXCLUDE THE OPINIONS AND TESTIMONY OF BRIAN RAYBON, M.D.**

Plaintiffs, Juanita Barton and James Dean, file this response in opposition out of an abundance of caution. Plaintiffs designated Dr. Raybon as a general expert in the above-referenced case.

In response to Defendants' notice adopting their prior *Daubert* Motion for Brian Raybon M.D. (Docs 2115, 2116 and 2264). Plaintiffs hereby adopt and incorporate by reference their prior responsive briefing (Doc 2201 and 2687) in opposition to the motion to exclude his testimony. Plaintiffs respectfully request that the Defendants' motion be denied for the reasons stated in the prior briefing.

Dated: November 25, 2019

Respectfully Submitted,

/s/ Charles E. Soechting, Jr.

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COUNSEL FOR PLAINTIFFS

CERTIFICATION OF SERVICE

I hereby certify that on November 25, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which shall send notification of such filing to all CM/ECF participants.

/s/ Charles E. Soechting, Jr.
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